

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS**

**Civil Action No. 4:22-cv-249-ALM**

DIVYA GADASALLI,

Plaintiff,

v.

JERRY BULASA, ET AL.

Defendants.

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**PROPOSED SCHEDULING ORDER DEADLINES**

The following actions shall be completed by the date indicated:

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| 1. Joinder of any additional parties and filing of motion to amend the pleadings by                                      | <b>Thirty days from resolution of the pending motion to dismiss, if needed.</b> |
| 2. Parties shall select a mediator pursuant and shall schedule a time, date, and place for mediation by                  | <b>Sixty days from resolution of the pending motion to dismiss, if needed.</b>  |
| 3. Plaintiffs shall disclose experts, expert witness summaries, and reports as required by Fed. R. Civ. P. 26(a)(2) by   | <b>Four months from resolution of the pending motion to dismiss, if needed.</b> |
| 4. Defendant(s) shall disclose experts, expert witness summaries, and reports as required by Fed. R. Civ. P. 26(a)(2) by | <b>Five months from resolution of the pending motion to dismiss, if needed.</b> |
| 5. Exchange of rebuttal expert witness summaries and reports as required by Fed. R. Civ. P. 26(a)(2) by                  | <b>Six months from resolution of the pending motion to dismiss, if needed.</b>  |

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| 6. Written lists containing the names and addresses of all fact witnesses intended to be called at trial by   | <b>Three months from resolution of the pending motion to dismiss, if needed</b>  |
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| 7. Fact discovery shall be completed by   | <b>Four months from resolution of the pending motion to dismiss, if needed.</b>  |
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| 8. Expert discovery shall be completed by   | <b>Seven months from resolution of the pending motion to dismiss, if needed.</b> |
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| 9. Mediation shall be completed by  | <b>Eight months from resolution of the pending motion to dismiss, if needed.</b> |
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| 10. Dispositive motions, including summary judgment and <i>Daubert</i> , shall be filed by  | <b>Eight months from resolution of the pending motion to dismiss, if needed.</b> |
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| 11. Deposition designations and counter designations shall be filed by  | <b>Two months prior to trial date.</b>   |
| <br>  |  |
| The parties shall meet and confer prior to submitting the deposition designations and counter-designations in a good faith effort to resolve objections. Failure to comply with deadline and the meet and confer may result in objections being stricken or other appropriate sanctions.  |  |
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| 12. All pretrial motions and memoranda of law, including motions <i>in limine</i> , shall be filed by   | <b>30 days prior to trial date</b>   |
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| Prior to filing any motions <i>in limine</i> , the parties shall meet and confer in a good faith effort to resolve any issues. If a party has multiple motions <i>in limine</i> , they shall be filed as a single omnibus motion. All motions <i>in limine</i> and the responses shall be limited to one page per issue. No replies shall be permitted. |  |

13. Joint pretrial stipulation, deposition designations and counter- designations, proposed joint jury instructions, proposed joint verdict form, and/or proposed findings of fact and conclusions of law shall be filed by

**30 days prior to trial date**

**Respectfully Submitted By:**

**SILVER MILLER**

/s/ David C. Silver

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Dated: June 29, 2022

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Dated: June 29, 2022